

Robert T. Mills (Arizona Bar #018853)
Sean A. Woods (Arizona Bar #028930)
MILLS + WOODS LAW, PLLC
5055 North 12th Street, Suite 101
Phoenix, Arizona 85014
Telephone 480.999.4556
docket@millsandwoods.com
swoods@millsandwoods.com
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Debra Morales Ruiz, an individual, for
herself and on behalf of and as pending
Personal Representative of The Estate of
Alexander Chavez; Alex George Chavez,
an individual,

Plaintiffs,

vs.

County of Maricopa, a governmental
entity; Brandon Smith and Jane Doe
Smith; Paul Penzone and Jane Doe
Penzone; David Crutchfield, an individual;
Lisa Struble, an individual; Kyle Moody
and Jane Doe Moody; Arturo Dimas and
Jane Doe Dimas; Tyler Park and Jane Doe
Park; Gerardo Magat and Jane Doe Magat;
Daniel Hawkins Jr. and Jane Doe
Hawkins; Javier Montano and Jane Doe
Montano; James Dailey and Jane Doe
Dailey; Trevor Martin and Jane Doe
Martin; Greggory Hertig and Jane Doe
Hertig; John Chester and Jane Doe
Chester; Jorge Espinosa Jr. and Jane Doe
Espinosa; Morgan Rainey and John Doe
Rainey; Stefanie Marsland and John Doe
Marsland; and, John and Jane Does 1-40,

Defendants.

No.: CV-23-02482-PHX-SRB (DMF)

**PLAINTIFFS' NOTICE OF FILING
SECOND AMENDED COMPLAINT**

(Assigned to the Honorable Susan R.
Bolton and referred to the Honorable
Deborah M. Fine)

1 Through undersigned counsel and pursuant to Local Rule 15.1(b), Plaintiffs hereby
2 give Notice of their filing this same day of their Second Amended Complaint in this action.
3 Attached to, and filed concurrently with, this Notice is a copy of the Second Amended
4 Complaint that indicates in what respect it differs from the First Amended Complaint by
5 bracketing or striking through the text that was deleted and underlining the text that was
6 added.
7

8 **RESPECTFULLY SUBMITTED** this 3rd day of September 2024.
9

10 **MILLS + WOODS LAW, PLLC**

11
12 By /s/ Sean A. Woods
13 Robert T. Mills
14 Sean A. Woods
15 5055 N 12th Street, Suite 101
16 Phoenix, AZ 85014
17 *Attorneys for Plaintiffs*
18
19
20
21
22
23
24
25
26
27
28

MILLS + WOODS LAW, PLLC
5055 North 12th Street, Suite 101
Phoenix, AZ 85014
480.999.4556

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2024, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Courtney R. Glynn
glynnnc@mcao.maricopa.gov
Michael E. Gottfried
gottfrim@mcao.maricopa.gov
RACHEL H. MITCHELL
MARICOPA COUNTY ATTORNEY
CIVIL SERVICES DIVISION
judith.ezeh@mcao.maricopa.gov
rojass@mcao.maricopa.gov
christij@mcao.maricopa.gov
rita.kleinman@mcao.maricopa.gov

225 W Madison St.
Phoenix, AZ 85003

Attorneys for Maricopa County, Dimas, Hawkins, Hertig, Martin, Montano, Moody, Park, Smith, Chester, Rainey, Marsland, Struble, Crutchfield, Magat, Dailey, and the Maricopa County Sheriff

/s/ Ben Dangerfield